

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JOHN SABAL,

§

Plaintiff,

§

v.

CIVIL ACTION NO. 4:23-CV-01002-O

ANTI-DEFAMATION LEAGUE,

§

Defendant.

§

**DEFENDANT ANTI-DEFAMATION LEAGUE'S MOTION TO DISMISS PLAINTIFF'S
COMPLAINT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(B)(6)**

Upon the accompanying Memorandum of Law and the Appendix and its accompanying exhibits, Defendant Anti-Defamation League moves the Court, before the Honorable Reed O'Connor, United States District Judge, for an Order granting its motion to dismiss the complaint pursuant to Federal Rule of Civil Procedure 12(b)(6), and dismissing the Complaint with prejudice.

Dated: December 15, 2023

/s/ Robert P. Latham

Robert P. Latham State Bar No. 11975500

JACKSON WALKER LLP

2323 Ross Avenue, Suite 600

Dallas, Texas 75201

(214) 953-6000 – Telephone

(214) 953-5822 – Facsimile

blatham@jw.com

Trevor Paul State Bar No. 24133388

JACKSON WALKER LLP

777 Main St., Suite 2100,

Fort Worth, Texas 76102

817.334.7200 – Telephone

(214) 953-5822 – Facsimile

tpaul@jw.com

Nathan Siegel (admitted *pro hac vice*)
DAVIS WRIGHT TREMAINE LLP
1301 K Street
Suite 500 East
Washington, DC 20005
Phone: (202) 973-4237
Fax: (202) 973-4499
nathansiegel@dwt.com

Jesse Feitel (admitted *pro hac vice*)
DAVIS WRIGHT TREMAINE LLP
1251 Avenue of the Americas, 21st Floor
New York, NY 10020-1104
Phone: (212) 489-8230
Fax: (212) 489-8340
jessefeitel@dwt.com

Attorneys for Defendant Anti-Defamation League

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above document has been served on all counsel of record, via the Court's CM/ECF system, in accordance with the Federal Rules of Civil Procedure, on this 15th day of December, 2023.

/s/ Robert P. Latham
Robert P. Latham